

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ITEM: 11 (Rev. 1)

AGENDA ID: 17362

ENERGY DIVISION

RESOLUTION E-4974

May 16, 2019

R E S O L U T I O N

Resolution E -4974. Pacific Gas and Electric Company Request for Approval of Proposal and Cost Recovery for Click-Through Performance Metrics pursuant to Resolution E-4868.

PROPOSED OUTCOME:

- Approves PG&E's proposed scope and definitions for development of a Click-Through Performance Metrics website and its request to spend \$ 430,600 for this purpose.

SAFETY CONSIDERATIONS:

- There is no impact on safety.

ESTIMATED COST:

- \$ 430,600. This cost is part of previously approved budget cap of \$ 10.39 million in D.16-06-008, as modified by D. 17-06-005, to be recovered from all ratepayers.

By Advice Letters 5190-E and -E-A Filed on November 22, 2017 and August 6, 2018, respectively.

SUMMARY

This Resolution approves 1) PG&E's proposal of the scope and definitions of performance metrics on a public website for the customer online click-through authorization process to allow PG&E to release energy-related data to a customer-designated third-party Demand Response Provider (DRP) and 2) PG&E's request to spend \$430,600 for the development of the performance metrics website.

The requirements for the metrics were specified in Resolution E-4868 and subsequently refined and agreed upon between all large Investor-Owned

Utilities (IOUs) and the stakeholders in Customer Data Access Committee meetings (CDAC). The expenditure for the website development is to be derived under a budget cap approved in D. 16-06-008, as modified by D. 17-06-005.

BACKGROUND

D.12-11-025 ordered the implementation of Rule 24 (Direct Participation) which allows third-party Demand Response Providers (DRPs) access to retail customers' data for purposes of registering them and using their load data in the CAISO market for demand response, but only after obtaining the customer's authorization. The Decision ordered the IOUs to create related documents to support this rule, which included a specific Customer Information Service Request for Demand Response Providers (CISR-DRP) form. The form is used by the customer to authorize a IOU to release the customer's data to a third-party DRP.

To address DRP concerns that the CISR-DRP form process was cumbersome, the Commission sought to streamline the process. D.16-06-008¹ ordered the IOUs to collaboratively develop an on-line "click-through" authorization process that begins and ends on a third-party DRP's website and provides customer authentication and authorization for the IOU to release the customer's data to a third-party DRP, and to develop consensus proposals on how to simplify the Direct Participation enrollment process.²

The IOUs and Energy Division hosted working group meetings with stakeholders and interested parties on "Streamlining and Simplification of Direct Participation Enrollment Process" in 2016. DRPs advocated for daily online reporting performance metrics tracking the click-through process, including a list of proposed metrics, included in an informal status report submitted as a part of the working group process. The IOUs submitted to Energy Division their respective plans for improving the Electric Rule 24 Direct Participation Data Release Authorization Click-Through Process on January 3, 2017. PG&E's proposal included posting performance metrics for the click-through

¹ D.16-06-008, pages 11-14; FoF 5, 6, and 7; Conclusions of Law (CoL) 2 and 3; OP 1.

² D.16-06-008, CoL 13; OP 9 and 10.

authentication and authorization process on a quarterly or monthly basis, due to the time, cost, and complexity required to provide more frequent reporting, and the low priority placed on this topic by stakeholders in the working group.

On August 24, 2017, the Commission issued Resolution E-4868 (Resolution), approving the IOUs' respective proposals for improving the Data Release Authorization Click-Through Process submitted in January 2017, with modifications, including requiring the IOUs to develop a publicly available webpage or dashboard to monitor the performance of the click-through solution, which is updated at least daily, with up to a day's delay. The Resolution³, also required the IOUs to report performance metrics for Rule 24 (Direct Participation) data delivery, particularly to track missing data or gaps in data, among other aspects. Further, the Resolution directed the IOUs to (1) work with the Customer Data Access Committee (CDAC) to develop a performance metrics website, and (2) submit the consensus proposal to the Commission's Energy Division within 90 days⁴. Lastly, Ordering Paragraph 21 of the Resolution ordered the IOUs to capture these performance metrics on an ongoing basis within the Quarterly Report Regarding the Status of Third-Party Demand Response Direct Participation Rule 24 compliance, which will be filed through 2020, with the format of the performance metrics additions to the quarterly reports to be developed with input by CDAC stakeholder participants.

Pursuant to the Resolution,⁵ the IOUs held several meetings with the CDAC in October and November 2017, to develop the consensus proposal for implementing a performance metrics website for tracking the click-through process, data delivery, and data quality within the time frames. PG&E filed the subject AL to 1) describe the consensus proposal and 2) seek approval of the consensus proposal and 3) request funding authorization to develop the performance metrics website.

³ Resolution E-4868, pp.56-57.

⁴ Resolution E-4868, OP 21

⁵ Resolution E-4868, OP 26

On November 15, 2018 PG&E sent a letter to the Commission's Executive Director to request an extension of the deadline for implementing the website from November 26, 2018⁶, to January 31, 2019. PG&E's extension request was granted on November 30, 2018. The website has been implemented by PG&E by the requested extension date.

NOTICE

Notice of AL 5190-E and 5190-E-A was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter and the Supplement was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

PG&E's Advice Letter 5190-E was timely protested by CPower, EnerNOC, Inc., and EnergyHub (collectively, the "Joint Demand Response (DR) Parties" or "JDRP") on December 12, 2017.

The JDRP stated that the IOUs consensus proposals were "inconsistent, unclear, and use different nomenclature". While the JDRP acknowledged that only PG&E presented their proposal in "tangible" form and covered almost all requirements of Resolution E-4868, it nevertheless suggested that Supplemental ALs be filed by all IOUs with precise definitions of each metric provided, following a teleconference with the JDRP.

PG&E responded to the protest on December 19, 2017 that the proposal as filed in the AL was sufficiently detailed and the CDAC meeting would be the proper forum to discuss further details, instead of the proposed teleconference.

On February 5, 2018, the Energy Division requested, by email, that PG&E submit a Supplemental AL with definitions for the performance metrics, which should

⁶ The deadline was ordered by Resolution E-4868.

provide additional detail and be better aligned across IOUs based on further discussions with the JDRP.

The IOUs collaborated during a series of conference calls and discussed the definitions in detail during the March 22, 2018, and April 19, 2018, CDAC meetings.

PG&E submitted the Supplemental AL 5190-E-A with the consensus definitions on August 6, 2018. The Supplement was not protested.

DISCUSSION

The Commission has reviewed AL 5190-E, the JDRP protest, and the Supplemental AL 5190-E-A.

PG&E seeks 1) approval of the consensus proposal, including the consensus definitions with additional details, as well as consistency across the IOUs, for implementing a website to display metrics for tracking the performance of i) the click-through process and ii) data delivery, and 2) funding authorization to implement the performance metrics website. Each item is discussed separately below.

Proposal for Performance Metrics Website

1) Consensus Definitions

As noted earlier, in response to Energy Division's request, the IOUs collaborated during a series of conference calls and discussed the definitions in detail with stakeholders in CDAC meetings, eventually developing the consensus definitions that are described at length in the Supplement and not duplicated here. The Supplement was not protested. We have reviewed the proposed definitions of performance metrics in the Supplement for clarity and consistency, found them satisfactory. We conclude that the Supplement was responsive to Energy Division's request and adequately addressed the concerns raised by JDRP in its protest. Thus, we reject the JDRP protest.

2) Click-Through Process Performance Metrics

In AL 5190-E PG&E described the metrics to be captured, aggregated, stored and published daily with a day's delay on a website, and to be reported on a quarterly basis to the Energy Division as part of the Quarterly Status of the Third-party DR Rule 24 Direct Participation report. In general terms they are:

- Page views per path
- Unique visitors per path
- Response time per page: mean, max, standard deviation, and 90th percentile
- Dwell time per page: mean, max., standard deviation, and 90th percentile

We have reviewed the proposal specific to the click-through process performance metrics and find it satisfactory.

3) Data Delivery Performance Metrics

PG&E's proposal in AL 5190-E divided the data delivery performance metrics into two categories, as summarized below.

Category 1- Aggregate metrics for synchronous (within 90 seconds) Application Program Interface (API) requests:

- Number of total requests for customer Service Agreements
- Mean response time
- Median response time
- Number of requests that resulted in more than 90 second response time
- Percentage of requests that resulted in more than 90 second response time

Category 2- Data availability of key missing data elements under Account Elements, Service Elements, Demand Response data groups (including daily summary statistics and rolling 30 days aggregate statistics, with one day delay)

- Number of total requests
- Missing data count
- Number of requests available within 90 seconds
- Number of requests available within two days

Subsequent to Energy Division's request to revise the definitions in collaboration with other IOUs and stakeholders, further discussions in the March and April 2018 CDAC meetings resulted in limited feedback about the value of aggregate data within the above Category 2, leading to the realization that these metrics in aggregate form were thought to provide little information or be potentially quite misleading. As a result, the Supplemental AL noted that PG&E and other IOUs do not plan to provide Category 2 metrics online. However, PG&E instead plans to track those metrics internally and is open to including them in the public website if later found useful.

As noted earlier, no protests were filed to the Supplement, including PG&E's recommendation to drop Category 2 metrics. We have reviewed PG&E's proposal specific to the data delivery performance metrics, we find them satisfactory, and concur with the Supplement's recommendation to forego implementation of on-line Category 2 metrics at this time due to the limited value.

4) Summary

As noted earlier, we have reviewed each of the three elements of the consensus proposal (definitions, metrics for click-through process, and metrics for data delivery) as described in the subject AL and the Supplement for implementing a website for tracking the performance metrics and found them satisfactory. We conclude that in submitting the proposal, PG&E has complied with the Resolution (E-4868) directive to work with the Customer Data Access Committee (CDAC) to develop a consensus proposal for performance metrics.

The Energy Division has confirmed the website has been implemented and is currently operating.

The Commission rejects JDRP's protest and approves the proposal as filed in the subject AL and the associated Supplement.

Funding Request

With respect to the click-through performance metrics, PG&E noted in the subject AL that it was able to develop a solution that satisfied the stakeholders' requirements with previously authorized budget in the Resolution.

However, PG&E does seek funding authorization of \$ 430,600 for the development of the Data Delivery Performance Metrics, which it asserts is still within the \$10.39 million budget cap previously approved in Decision (D.) 16-06-008 for such purposes.⁷

We confirm that the \$ 430,600 requested by PG&E to implement the data delivery metrics in the performance metric website is within the budget cap authorized in D. 16-06-008 as modified by D. 17-06-005.

We find that the requested amount of \$430,600 is reasonable and it is therefore authorized.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

On April 30 PG&E commented that it appreciates the Draft Resolution's approval of the advice letter project scope and budget to support the development of a Click-Through Performance website and respectfully requests the Commission adopt it.

PG&E implemented the website by January 31, 2019, pursuant to an extension granted by the Commission.

⁷ (D.) 16-06-008.⁷ OP 13, as modified by D. 17-06-005. Pursuant to Res. E-4868, OP 28, Table 2 and 3.

FINDINGS

1. Commission Resolution E-4868 directed PG&E to file an Advice Letter with a consensus proposal for developing the click-through performance metrics website and seek authorization for related funding.
2. PG&E in cooperation with the other IOUs and the CDAC stakeholders developed a consensus proposal with scope and definitions of the metrics as required by Resolution E-4868.
3. PG&E's requested \$ 430,600 for developing the data delivery metrics in the website is within the budget cap authorized in D. 16-06-008 as modified by D. 17-06-005 and is reasonable.
4. The website has been implemented and is currently operational.
5. The Commission finds the revised definitions of metrics as filed in the subject Supplement to be sufficiently detailed and consistent across the IOUs, and the JDRP protest is thus rejected.

THEREFORE IT IS ORDERED THAT:

1. PG&E's Advice Letter 5190-E and Supplement 5190-E-A are approved.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on May 16, 2019 the following Commissioners voting favorably thereon:

ALICE STEBBINS
Executive Director